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15 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and*
 16 *MT Picture Display Co., Ltd.*

17 **IN THE UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

19 **In re CATHODE RAY TUBE (CRT)**
ANTITRUST LITIGATION

) MDL No. 1917
) Master No. 3:07-cv-05944-SC

20 This Document Relates to:

21 ALL INDIRECT-PURCHASER ACTIONS

22 *Electrograph Sys., Inc., et al. v. Hitachi, Ltd., et*
 23 *al., No. 11-cv-01656;*

24 *Electrograph Sys., Inc., et al. v. Technicolor SA,*
et al., No. 13-cv-05724;

25 *Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;*

26 *Siegel v. Technicolor SA, et al., No. 13-cv-*
 27 *05261;*

28 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*

) **DECLARATION OF DAVID E.**
) **YOLKUT IN SUPPORT OF**
) **PANASONIC DEFENDANTS'**
) **ADMINISTRATIVE MOTION TO FILE**
) **UNDER SEAL DEFENDANTS' REPLY**
) **IN SUPPORT OF MOTION FOR**
) **PARTIAL SUMMARY JUDGMENT**
) **AGAINST INDIRECT PURCHASER**
) **PLAINTIFFS AND CERTAIN DIRECT**
) **ACTION PLAINTIFFS FOR LACK OF**
) **ANTITRUST INJURY AND**
) **ANTITRUST STANDING UNDER**
) **FEDERAL AND CERTAIN STATE**
) **LAWS**

1 No. 11-cv-05513;)
 2 *Best Buy Co., Inc., et al. v. Technicolor SA, et*)
al., No. 13-cv-05264;)
 3 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*)
 4 *et al.*, No. 11-cv-05514;)
 5 *Target Corp. v. Technicolor SA, et al.*, No. 13-)
 cv-05686;)
 6 *Sears, Roebuck & Co., et al. v. Chunghwa*)
 7 *Picture Tubes, Ltd., et al.*, No. 11-cv-05514;)
 8 *Sears, Roebuck & Co., et al. v. Technicolor SA,*)
et al., No. 13-cv-05262;)
 9 *Interbond Corp. of Am. v. Hitachi, Ltd., et al.*,)
 No. 11-cv-06275;)
 10 *Interbond Corp. of Am. v. Technicolor SA, et al.*,)
 11 No. 13-cv-05727;)
 12 *Office Depot, Inc. v. Hitachi, Ltd., et al.*, No. 11-)
 cv-06276;)
 13 *Office Depot, Inc. v. Technicolor SA, et al.*, No.)
 14 13-cv-05726;)
 15 *CompuCom Systems, Inc. v. Hitachi, Ltd., et al.*,)
 No. 11-cv-06396;)
 16 *Costco Wholesale Corp. v. Hitachi, Ltd., et al.*,)
 17 No. 11-cv-06397;)
 18 *Costco Wholesale Corp. v. Technicolor SA, et*)
al., No. 13-cv-05723;)
 19 *P.C. Richard & Son Long Island Corp., et al. v.*)
Hitachi, Ltd., et al., No. 12-cv-02648;)
 20 *P.C. Richard & Son Long Island Corp., et al. v.*)
 21 *Technicolor SA, et al.*, No. 13-cv-05725;)
 22 *Schultze Agency Servs., LLC v. Hitachi, Ltd., et*)
al., No. 12-cv-02649;)
 23 *Schultze Agency Servs., LLC v. Technicolor SA,*)
 24 *et al.*, No. 13-cv-05668;)
 25 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*,)
 No. 13-cv-00157)
 26 *Viewsonic Corp. v. Chunghwa Picture Tubes,*)
 27 *Ltd., et al.*, No. 14-cv-02510)
 28

1 I, David E. Yolkut, hereby declare as follows:

2 1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.
4 (collectively, the "Panasonic Defendants") in these actions. I am a member of the bar of the State of
5 New York and I am admitted to practice before this Court *pro hac vice*.
6

7 2. I submit this Declaration in Support of Panasonic Defendants' Administrative Motion to File
8 Under Seal Defendants' Reply in Support of Motion for Partial Summary Judgment Against Indirect
9 Purchaser Plaintiffs and Certain Direct Action Plaintiffs for Lack of Antitrust Injury and Antitrust
10 Standing Under Federal and Certain State Laws ("Defendants' Antitrust Standing Reply"). I have
11 personal knowledge of the facts stated herein and, if called as a witness, I could and would
12 competently testify thereto.
13

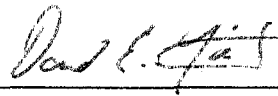
14 3. On June 18, 2008, the Court approved a "Stipulated Protective Order" in this matter (No. 07-
15 cv-05944, Dkt. No. 306, amended at Dkt. No. 1142) (the "Protective Order").

16 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), Panasonic
17 Defendants seek to seal the highlighted portions of Defendants' Antitrust Standing Reply, which is
18 being concurrently filed. These highlighted portions reference confidential information contained in
19 documents previously submitted under seal by Panasonic Defendants (*see* Dkt. 3051) and/or
20 Plaintiffs (*see* Dkt. 3245).
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on January 23, 2015 at New York, New York.

3
4 By:


DAVID E. YOLKUT